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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Murat Ozdemir,

Plaintiff,

v.

Merrick Garland, Attorney General of the  
United States of America; Alejandro  
Mayorkas, Secretary of Department of  
Homeland Security; Ur Jaddou, U.S  
Citizenship and Immigration Services; Clyde  
Moore Field Office Director, Las Vegas  
Field Office U.S. Citizenship and  
Immigration Services;

Defendants.

Case No. 2:22-cv-01799-CDS-DJA

**Stipulation and Order**

**(Second Request)**

Plaintiff Murat Ozdemir and United States of America, on behalf of Federal  
Defendants Merrick Garland, Attorney General of the United States of America, Alejandro  
Mayorkas, Secretary of Department of Homeland Security, Ur Jaddou, U.S. Citizenship  
and Immigration Services, Clyde Moore, Field Office Director, Las Vegas Field Office  
U.S. Citizenship and Immigration Services ("Federal Defendants"), hereby stipulate and  
agree as follows:

Plaintiff filed his Complaint on November 2, 2022.

Plaintiff served the United States with a copy of the Summons and Complaint via  
Certified Mail on February 16, 2023.

Pursuant to the first request for an extension which was approved by the Court on April 13, 2023, the current deadline for the United States to respond to the Plaintiff's Complaint is on May 17, 2023. ECF No. 9.

Plaintiff and the Federal Defendants, through undersigned counsel, stipulate and request that the Court approve a 30-day extension of time, from May 17, 2023, to June 19, 2023, for Federal Defendants to file a response to the Complaint, ECF No. 2. This is the second request for an extension of time.

The parties request this additional time to engage in discussions directed at resolving this matter, as the Plaintiff has requested to have his case re-open with the agency and to provide additional information regarding his good moral character. The parties have begun those discussions and hope they can resolve the matter without the need for additional cost or further court intervention.

Therefore, the parties request that the Court extend the deadline for the United States to answer or otherwise respond to June 19, 2023.

This stipulated request is filed in good faith and not for the purposes of undue delay.

Respectfully submitted this 15th day of May 2023.

LAW OFFICES OF PETER L. ASHMAN

JASON M. FRIERSON

United States Attorney

/s/ Peter L. Ashman  
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**IT IS SO ORDERED:**



**UNITED STATES MAGISTRATE JUDGE**

**DATED:** May 16, 2023